

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**HPA Monon Corporation
One Water Tower Drive
Monon, Indiana 47959**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T181-9293-00041	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 19, 2001

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)], [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary :

Responsible Official: William R. Herndon
Source Address: 6929 N. US HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, Indiana 47959
Phone Number: (219) 253-6621
SIC Code: 3715
County Location: White
County Status: Attainment for all criteria pollutants
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Major, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

Plant 5 is located on property less than (2) two miles from the Main Facility location. Plant 5 is separated from the main facility by the town of Monon, and HPA Monon does not own the separating properties. Plants 1, 2, 6, 7 & 8 are located on contiguous properties. Plant 5 performs the flooring operation for the trailers. Plant 5 and the other plants have the same SIC codes and are owned by (1) one company. The (6) six plants will be considered (1) one source, effective from the date of issuance of this Part 70 permit.

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

The source consists of the following permitted emission units and pollution control devices:

Plant 1 consisting of:

Finish paint booth, identified as 1-001 with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control.

Paint booth, identified as 1-002 with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control.

Assembly : caulk & glue, identified as 1-003 with a maximum capacity of 6.8 gal/hr of glue and caulk.

Halogenated solvent cleaner, identified as 1-004 with a maximum capacity of 10 gallons.

Plant 2 consisting of:

Primary paint booth, identified as 2-001 with a maximum capacity of 27.6 gal/hr of paint, using dry filters as particulate control.

Assembly : caulk & glue, identified as 2-002 with a maximum capacity of 4.5 gal/hr of glue.

Plant 5 consisting of:

One 30 million BTU/hr wood-fired boiler identified as 5-001, with particulate emissions exhausting through Stack 5-001a.

One 29 million BTU/hr wood-fired dutch oven boiler identified as 5-002, with particulate emissions controlled by a multi-cyclone collector, exhausting through Stack 5-002a.

Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses (5-003a and 5-003b) as particulate matter control.

One planer identified as 5-004 with a maximum capacity to plane 43,500 lb/hr of raw wood, using a baghouse (5-004a) as particulate matter control.

Plant 6 consisting of:

Chassis prime & finish paint line, identified as 6-001 with a maximum capacity of 28.2 gallons/hr of paint, using dry filters as particulate control.

Steel grit blaster, identified as 6-002 with a maximum capacity of 67,200 lbs /hr of steel grit to blast metal frames, using a baghouse (6-002a) as particulate control.

Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs /hr of steel grit to blast metal parts, using a baghouse (6-003a) as particulate control.

Area welding identified as 6-004 with a maximum capacity of 249 lbs/hr of weld wire.

Plant 7 consisting of:

Converter dolly paint booth & oven, identified as 7-001 with a maximum capacity 10.2 gal/hr of paint, using dry filters as particulate control.

Hub paint booth, identified as 7-002 with a maximum capacity of 4.7 gal/hr of paint, using dry filters as particulate control.

Plant 8 consisting of:

29 million BTU/hr wood-fired dutch oven boiler, with alternate natural gas fuel, identified as 8-006, particulate emissions controlled by a multi-cyclone collector, exhausting through 8-006a.

Primer booth & oven, identified as 8-001 with a maximum capacity 13.8 gal/hr of paint, using dry filters as particulate control.

Finish paint booth, identified as 8-002 with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control.

Small paint booth, identified as 8-003 with a maximum capacity 33.0 gal/hr of paint, using dry filters as particulate control.

Glass & steel shot blaster, identified as 8-004 with a maximum capacity of 2,520 lbs /hr of glass or steel shot, using a baghouse (8-004a) as particulate control.

Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs /hr steel shot, using a baghouse (8-005a) as particulate control.

Area welding identified as 8-007 with a maximum capacity of 1096.7 lbs/hr of weld wire.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):
- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
 - (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
 - (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
 - (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
 - (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
 - (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
 - (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
 - (j) Closed loop heating and cooling systems.
 - (k) Any of the following structural steel and bridge fabrication activities:
Cutting 200,00 linear feet or less of one inch (1") plate or equivalent.
Using 80 tons or less of welding consumables.
 - (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
 - (m) Paved and unpaved roads and parking lots with public access.
 - (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
 - (o) Vents from ash transport systems not operated at positive pressure.
 - (p) Board coating booth (air atomized), identified as 5-011 with a maximum capacity to coat 1,750 linear feet per hour of wood floor boards for trailers, using dry filters as particulate control.
 - (q) Infrared cure equipment
 - (r) Blow down from any of the following: sight glass, boiler, cooling tower, compressors, or pumps.

- (s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, or woodworking operations.
- (t) Filter media changeout.
- (u) Painting operation that has the potential to emit less than the 5 tons per year of particulate matter (PM) and 10 tons per year of volatile organic compounds (VOC).
- (v) Woodworking operation that has the potential to emit less than 5 tons per year of particulate matter (PM).

Cleaners and solvents

Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAP's.

Water based adhesives that are less than 5% by volume VOC excluding HAP's.

Stationary fire pumps.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.3 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

The annual compliance certification report shall include the following:

- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
- (2) The compliance status;
- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
- (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,
Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) In addition to the non-applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:
- (1) Numerical limitations from the previous existing construction permits were incorporated into the Part 70 permit, except limits from:
- CP 181-6262-00016 issued November 12, 1996, which limited Plant 8 cross member paint booth to 100 tons per year of Volatile Organic Compounds. This paint booth has been dismantled and removed from the HPA Monon property.
- CP 181-2618-00016 issued March 3, 1993, for the Plant 6 chassis booth, identified as 6-001. The production limitation of 5 parts per hour has been removed and replaced with its calculated corresponding emission limitation of 250 tons of VOC per consecutive 12 month period rolled on a monthly basis.
- CP 181-3416-00016 issued Feb 2, 1995, for multiple sources in which all production limits have been removed and replaced with the following emission limits:
- (1) Plant 7 Hub Paint Booth, identified as 7-002, production limitation of 35 units per hour has been removed. Plant 7 Converter Dolly Paint Booth, identified as 7-001, production limitation of 6.5 units per hour has been removed and replaced with an emission limitation of 25 tons per year of VOC.
- (2) Plant 8 Coupler Paint Booth, identified as 8-002, production limitation of 3 units per hour has been removed. Plant 8 Module Paint Booth, identified as 8-001, production limitation of 9 units per hour has been removed and replaced with an emission limitation of 84 tons per year of VOC.
- (3) Plant 2 Paint Booth, identified as 2-001, production limitation of 2 units per hour has been removed and replaced with an emission limitation of 60 tons per year of VOC.

CP 181-4987-00016 issued April 16, 1996 for the Plant 8 small paint booth, identified as 8-003. The production limitation of 6 trailers per hour has been removed and replaced with an emission limitation of 40 tons per year of VOC.

CP 181-3416-00016 issued February 2, 1995, for the following sources:

- (A) Plant 6 steel shot blaster, identified as 6-002. The Particulate Matter emission rate of 41.0 pounds per hour, was calculated based on the total process weight rate of 67,200 pounds per hour. This limitation replaces a rate that was based on a process make up rate.
- (B) Plant 8 steel shot blaster, identified as 8-005. The Particulate Matter emission rate of 14.7 pounds per hour, was calculated based on the total process weight rate of 13,500 pounds per hour. This limitation replaces a rate that was based on a process make up rate.

CP 181-2618-00016 issued on March 3, 1993 for the Plant 6 steel shot blaster, identified as 6-003. The Particulate Matter emission rate of 45.3 pounds per hour was calculated based on the total process weight rate of 108,000 pounds per hour. This limitation replaces a rate that was based on a process make up rate.

CP- 181-3664-00010 issued February 1, 1995, for the following sources:

- (A) The Particulate Matter emission rate of 14.1 pounds per hour, for the wood working operations identified as 5-003, was calculated based on the total process weight rate of 12,600 pounds per hour.
- (B) The Particulate Matter emission rate of 32.3 pounds per hour, for the planer operations identified as 5-004, was calculated based on the total process weight rate of 43,500 pounds per hour.

Additional modifications of the previous existing construction permits were made for the following conditions:

- (1) Plant 8 Boiler, identified as 8-006, monitoring method using wood burn rate has been removed and replaced with a requirement to continuously record steam production.
- (2) CP 181-4762-00016 and Plant 8 Permit 70 Modification requires multi cyclone removal efficiency. This has been removed due to physical limitations of the existing equipment.
- (3) CP-181-4987-00016 requirements to tag filters and maintain 24 months of records has been removed and replaced with Preventive Maintenance Plan requirements.
- (4) CP-91-09-90-0087 indicated average boiler output of 14,000 pounds of steam per hour. This description has been modified to reflect the maximum boiler BTU input rating of 30 MMBTU per hour.
- (e) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

- (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
- (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
 - (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:
 - (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
 - (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (i) A brief description of the change within the source;

- (ii) The date on which the change will occur;
- (iii) Any change in emissions; and
- (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.21 Construction Permit Requirement [326 IAC 2]

A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

B.22 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.
- C.7 Stack Height [326 IAC 1-7]
The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 12, 1997 and the revised version on January 3, 2000.
- (b) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]
[326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.

- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
[326 IAC 2-7-6]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

**C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)]
[326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant 1

Finish paint booth, identified as 1-001 with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control.

Paint booth, identified as 1-002 with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control.

Assembly: caulk and glue, identified as 1-003 with a maximum capacity of 6.8 gal/hr of glue and caulk.

Halogenated solvent cleaner, identified as 1-004, with a maximum capacity of 10 gallons.

Plant 2

Primary paint booth, identified as 2-001 with a maximum capacity of 27.6 gal/hr of paint, using dry filters as particulate control.

Assembly : caulk & glue, identified as 2-002 with a maximum capacity of 4.5 gal/hr of glue.

Plant 6

Chassis prime & finish paint line, identified as 6-001, with a maximum capacity of 28.2 gal/hr of paint, using dry filters as particulate control.

Plant 7

Converter dolly paint booth & oven, identified as 7-001 with a maximum capacity 10.21 gal/hr of paint, using dry filters as particulate control.

Hub paint booth, identified as 7-002 with a maximum capacity of 4.7gal/hr of paint, using dry filters as particulate control.

Plant 8

Primer booth & oven, identified as 8-001 with a maximum capacity 13.8 gal/hr of paint, using dry filters as particulate control.

Finish paint booth, identified as 8-002 with a maximum capacity of 10.2 gal/hr, using dry filters as particulate control.

Small paint booth, identified as 8-003 with a maximum capacity 33.0 gal/hr of paint, using dry filters as particulate control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the finish paint booth 1-001, paint booth 1-002, primary paint booth 2-001, chassis & prime line 6-001, converter dolly paint booth 7-001, hub paint booth 7-002, primer booth 8-001, finish paint booth 8-002 and small paint booth 8-003, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized. Solvent containers used for gun storage during periods of non-production shall be closed in order that evaporation is minimized.

D.1.2 Standards for Halogenated solvent cleaner [326 IAC 20-6-1][40 CFR 63.462]

Pursuant to 326 IAC 20-6-1, 40 CFR 63.462 (Standard for Halogenated Solvent Cleaning)

- (a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirements specified in paragraph (a)(1) or (a)(2) of this section.
 - (1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or
 - (2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater.
- (b) Each owner or operator of a remote-reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- (c) Each owner or operator of a batch cold solvent cleaning machine complying with paragraphs (a)(2) or (b) of this section shall comply with the work and operational practice requirements specified in paragraphs (c)(1) through (c)(8) of this section.
 - (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
 - (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (c)(1) of this section.
 - (6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
 - (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - (8) Sponges, fabric, wood, and paper products shall not be cleaned.

- (d) Each owner or operator of a batch cold cleaning machine shall submit an initial notification report as described in Sec. 63.468 (a) and (b) and a compliance report as described in Sec. 63.468(c).

D.1.3 326 IAC 8-3-1 (organic solvent degreasing operations)

The owner or operator of a organic solvent degreasing: cold cleaning facility identified as 1-004 as shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain the cleaned parts for at least (15) fifteen seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operation requirements;
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP 181-3416-00016, issued on February 2, 1995,
 - (1) the total amount of VOC delivered to the applicator of spray operations, Converter dolly paint booth & oven, identified as 7-001, shall not exceed 25.0 tons per consecutive 12 month period rolled on a monthly basis.
- (b) Pursuant to CP 181-3416-00016, issued on February 2, 1995,
 - (1) the total amount of VOC delivered to the applicator of spray operations, primer booth & oven, identified as 8-001, shall not exceed 84.0 tons per consecutive 12 month period rolled on a monthly basis.
- (c) Pursuant to CP 181-4987-00016, issued on August 16, 1996,
 - (1) the total amount of VOC delivered to the applicator of spray operations, paint booth identified as 8-003, shall not exceed 40.0 tons per consecutive 12 month period rolled on a monthly basis.
- (d) Pursuant to CP 181-6262-00016, issued on November 12, 1996
 - (1) the total amount of VOC delivered to the applicator of spray operations, primary paint booth identified as 2-001, shall not exceed 60.0 tons per consecutive 12 month period rolled on a monthly basis.
- (e) Pursuant to CP 181-6262-00016, issued on November 12, 1996
 - (1) the total amount of VOC delivered to the applicator of spray operations, finish paint booth identified as 1-001, shall not exceed 80.0 tons per consecutive 12 month period rolled on a monthly basis.
- (f) Pursuant to 181-2618-00016, issued on March 3, 1993 limited to 5 parts per hour.
 - (1) the total amount of VOC delivered to the applicator of spray operations, chassis prime and finish paint line, identified as 6-001, shall not exceed 250 tons per consecutive 12 month period rolled on a monthly basis.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter from the surface coating operations, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the spray coating is in operation, in order to comply with this limit.

D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.9 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.10 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the surface coating, painting and grinding operations are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Monitoring

The compliance monitoring requirements applicable to this equipment are as follows:

1. The surface coating has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.4 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the being reported.

D.1.14 Reporting requirements for Halogenated solvent cleaner, identified as 1-004 [40 CFR 63.438]

- (a) Each owner or operator of a new solvent cleaning machine subject to the provisions of this subpart shall submit an initial notification report to the Administrator. New sources for which construction or reconstruction had commenced and initial startup had not occurred before December 2, 1994, shall submit this report as soon as practicable before startup but no later than January 31, 1995. New sources for which the construction or reconstruction commenced after December 2, 1994, shall submit this report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in Sec. 63.5(d)(1) of subpart A (General Provisions), with the revisions and additions in paragraphs (b)(1) through (b)(3) of this section.

- (1) The report shall include a brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line, or cold-line), solvent/air interface area, and existing controls.
 - (2) The report shall include the anticipated compliance approach for each solvent cleaning machine.
 - (3) In lieu of Sec. 63.5(d)(1)(ii)(H) of subpart A of this part, the owner or operator must report an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
- (b) Each owner or operator of a batch cold solvent cleaning machine subject to the provisions of this subpart shall submit a compliance report to the Administrator. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date specified in Sec. 63.460(d). For new sources, this report shall be submitted to the Administrator no later than 150 days after startup or May 1, 1995, whichever is later. This report shall include the requirements specified in paragraphs (c)(1) through (c)(4) of this section.
- (1) The name and address of the owner or operator.
 - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
 - (4) The compliance approach for each solvent cleaning machine.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

Plant 5

Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses (5-003a and 5-003b) as particulate matter control.

One planer identified as 5-004 with a maximum capacity to plane 43,500 lb/hr of wood, using a baghouse (5-004a) as particulate matter control.

Plant 6

Steel grit blaster, identified as 6-002 with a maximum capacity of 67,200 lbs /hr of steel grit to blast metal frames, using a baghouse (6-002a) as particulate control.

Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs /hr of steel grit to blast metal parts, using a baghouse (6-003a) as particulate control.

Plant 8

Glass & steel shot blaster, identified as 8-004 with a maximum capacity of 2,520 lbs /hr of steel or glass shot, using a baghouse (8-004a) as particulate control.

Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs /hr of steel shot, using a baghouse (8-005a) as particulate control.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the hog grinder and woodworking facilities, identified 5-003, shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

- (b) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the planer, 5-004, facilities shall not exceed 32.2 pounds per hour when operating at a process weight rate of 43,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel grit blaster, 6-002, shall not exceed 41.0 pounds per hour when operating at a process weight rate of 67,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel shot blaster, 6-003 facilities shall not exceed 45.3 pounds per hour when operating at a process weight rate of 108,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3 the allowable PM emission rate from the glass & steel shot blaster, 8-004, facilities shall not exceed 4.8 pounds per hour when operating at a process weight rate of 2520 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Pursuant to 326 IAC 6-3 the allowable PM emission rate from the large steel shot blaster, 8-005, facilities shall not exceed 14.7 pounds per hour when operating at a process weight rate of 13,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions at all times the respective operations (wood working operations, hog grinder, wood planer, steel grit blaster, steel shot blaster, glass & steel shot blaster, and large steel shot blaster) are in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinder & shot blasting at all times that the hog grinder, woodworking operations, wood planer, steel grit blaster, steel shot blaster, glass & steel shot blaster, and large steel shot blaster operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

D.2.6 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the baghouse stack exhausts for the woodworking operations, wood planer, grinding and blasting shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.8 Record Keeping Requirements and Reporting Requirements [326 IAC 2-7-5(3)] and [326 IAC 2-17-19]

- (a) To document compliance with Condition D.2.7, the Permittee shall maintain records of daily visible emission notations of the grinding and blasting stack exhaust.
- (b) To document compliance with Condition D.2.5, the Permittee shall maintain records of the results of the inspections required under Condition D.2.5.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One 29 million BTU/hr wood-fired dutch oven boiler. with alternate natural gas fuel identified as 8- 006, with particulate emissions controlled by a multi-cyclone collector, exhausting through Stack 8-006a.

One 600 HP or 30 million BTU/hr wood-fired boiler identified as 5-001, with particulate emissions exhausting through Stack 5-001a.

One 29 million BTU/hr wood-fired dutch oven boiler identified as 5-002, with particulate emissions controlled by a multi-cyclone collector, exhausting through Stack 5-002a.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter Limitations for Indirect Heating [326 IAC 6-2-4] [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-1 (Particulate Limitations for Indirect Heating), the three (3) boilers are limited as follows:

- (a) Pursuant to 326 IAC 6-2-3, the 30 million BTU/hr wood-fired dutch oven boiler identified as 5-001 is limited to 0.6 lb PM/MMBtu,
- (b) Pursuant to CP 181-3664-00010, issued on February 1, 1995, and 326 IAC 6-2-4, the 29 million BTU/hr wood-fired dutch oven boiler identified as 5-002 is limited to 0.38 lb PM/MMBtu,
- (c) Pursuant to 326 IAC 6-2-4, the 29 million BTU/hr wood-fired dutch oven boiler identified as 8-006 is limited to 0.42 lb PM/MMBtu.

D.3.2 Limited Steam Production [326 IAC 2-2-3]

The amount of steam produced by the 29 million BTU/hr wood-fired dutch oven boiler, identified as 8-006 shall be limited to 120 million pounds per 12-month period, based on a rolling monthly total. This limit is necessary in order to ensure that particulate matter of less than 10 microns in diameter (PM_{10}) from this facility is limited to less than 15 tons per year, and that the Prevention of Significant Deterioration (PSD) rules are not applicable.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, is required for this facility.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Compliance tests shall be performed for the 29 million BTU/hr wood-fired Dutch oven boiler identified as 8-006 to determine, at a minimum, the following parameters:

- (1) moisture content of the fuel wood;
- (2) amount of wood used per hour at maximum rating;
- (3) heating value of the fuel wood used;
- (4) PM, PM-10, and CO emission rates,

such that the following PSD Significant levels shall not be exceeded:

CO - 100 tons/yr, PM - 25 tons/yr, and PM_{10} - 15 tons/yr.

These tests shall be performed at least once every five (5) years from the date of the facility's previous valid compliance demonstration, using EPA methods acceptable to the Commissioner. PM₁₀ includes filterable and condensable PM₁₀. In the event that separate PM and PM₁₀ tests are not performed, PM₁₀ must be assumed at 100% of PM.

- (b) The Permittee is not required to test boilers 5-001 and 5-002 by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.3.5 Control Device Required for Particulate Matter

The particulate matter control device shall be operated at all times when the two 29 million BTU/hr wood-fired dutch oven boiler, identified as 8-006 and 5-002 are in operation. This requirement is necessary in order to ensure compliance with D.3.1 and that particulate matter of less than 10 microns in diameter (PM₁₀) from boiler (8-006) is limited to less than 15 tons per year, and that the Prevention of Significant Deterioration (PSD) rules are not applicable.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Continuous Chart Recorder Required

The amount of steam produced by the 29 million BTU/hr wood-fired dutch oven boiler, identified as 8-006 shall be continuously monitored and recorded by use of a continuous chart recorder. This requirement is necessary in order to ensure that particulate matter of less than 10 microns in diameter (PM₁₀) from this facility is limited to less than 15 tons per year, and that the Prevention of Significant Deterioration (PSD) rules are not applicable.

D.3.7 Visible Emissions Notations

- (a) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.8 Record Keeping Requirements [326 IAC 2-17-19]

- (a) To document compliance, the Permittee shall maintain records of the following for the 29 million BTU/hr boiler identified as 8-006:
 - Daily visible emission notations of the stack exhaust.
 - Continuous chart recorder data.

Amount of steam produced per calendar month and per 12-month period.

Pursuant to 40 CFR 60.48c, the Permittee shall maintain a record of the amount of fuel combusted per calendar month and per consecutive 12 month period.

All records shall be maintained for a period of five (5) years following the date of such record.

All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

- (b) To document compliance, the Permittee shall maintain records of the following for the 29 million BTU/hr boiler identified as 5-002:
 - (1) Daily visible emission notations of the stack exhaust.
 - (2) Monthly fuel combusted pursuant to 40 CFR 60.48C
- (c) To document compliance, the Permittee shall maintain records of the following for the 30 million BTU/hr boiler identified as 5-001:
 - (1) Daily visible emission notations of the stack exhaust.

D.3.9 Reporting Requirements [326 IAC 2-7-5(3)]

Reporting Requirements for the 29 million BTU/hr boiler identified as 8-006

A quarterly summary of the information to document compliance with D.3.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit or their equivalent, within thirty (30) days after the end of the period being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name HPA Monon Corporation
Source Address: 6929 N. US HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT**

Source Name: HPA Monon Corporation
Source Address: 6929 North U.S. Highway 421, Monon, IN 47959
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: 181-9293-00041

This form consists of 2 pages

Page 1 of 2

- | | |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12) |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 North U.S. Highway 421, Monon, IN 47959
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: 181-9293-00041
Facility: Plant 8 Boiler (8-006)
Parameter: Steam Production
Limit: 120 million pounds steam per 12-month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Converter Dolly (7-001)
Parameter: VOC
Limit: 25 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Paint booth (8-003)
Parameter: VOC
Limit: 40 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Primer booth (8-001)
Parameter: VOC
Limit: 84 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Finish paint booth (1-001)
Parameter: VOC
Limit: 80 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Primary paint booth (2-001)
Parameter: VOC
Limit: 60 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041
Facility: Chassis Paint Booth (6-001)
Parameter: VOC
Limit: 250 tons per consecutive 12 month period rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: HPA Monon Corporation
Source Address: 6929 N. Us HWY 421
Mailing Address: One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655
Part 70 Permit No.: T181-9293-00041

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name: HPA Monon Corporation
Source Location: 6929 N. US HWY 421, Monon, Indiana 47959
County: White
SIC Code: 3715
Operation Permit No.: T181-9293-00016
Permit Reviewer: R.Dancy

The Office of Air Management (OAM) has reviewed a Part 70 permit application from HPA Monon Corporation relating to the operation of a semi tractor trailer manufacturing plant.

Source Definition

This trailer manufacturing plant consists of six (6) plants:

- (a) Plant 1 is located at 6929 N. US HWY 421, Monon, Indiana;
- (b) Plant 2 is located at 6929 N. US HWY 421, Monon, Indiana;
- (c) Plant 5 is located at State Road 16 West, Monon, Indiana;
- (d) Plant 6 is located at 6929 N. US HWY 421, Monon, Indiana;
- (e) Plant 7 is located at 6929 N. US HWY 421, Monon, Indiana;
- (f) Plant 8 is located at 6929 N. US HWY 421, Monon, Indiana;

Plant 5 is located on property with less than (2) two miles from the Main Facility location. Plant 5 is separated from the main facility by the town of Monon, and HPA Monon does not own the separating properties. Plants 1,2,6,7 & 8 are located on contiguous properties. Plant 5 performs the flooring operation for the trailers. Plant 5 and the other plants have the same SIC codes and are owned by (1) one company. The (6) six plants will be considered (1) one source, effective from the date of issuance of this Part 70 permit.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Plant 1 consisting of:

Finish paint booth, identified as 1-001 with a maximum capacity of 55.2 gal/hr of paint, using dry filters as particulate control.

Paint booth, identified as 1-002 with a maximum capacity of 13.8 gal/hr of paint, using dry filters as particulate control.

Assembly : caulk & glue, identified as 1-003 with a maximum capacity of 6.8 gal/hr of glue and caulk.

Halogenated solvent cleaner, identified as 1-004 with a maximum capacity of 10 gallons.

Plant 2 consisting of:

Primary paint booth, identified as 2-001 with a maximum capacity of 27.6 gal/hr of paint, using dry filters as particulate control.

Assembly : caulk & glue, identified as 2-002 with a maximum capacity of 4.5 gal/hr of glue.

Plant 5 consisting of:

One 30 million BTU/hr wood-fired boiler identified as 5-001, with particulate emissions exhausting through Stack 5-001a.

One 29 million BTU/hr wood-fired dutch oven boiler identified as 5-002, with particulate emissions controlled by a multi-cyclone collector, exhausting through Stack 5-002a.

Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two bag houses as particulate matter control.

One planer identified as 5-004 with a maximum capacity to plane 43,500 lb/hr and excess truck floors, using a baghouse (5-004a) as particulate matter control.

Plant 6 consisting of:

Chassis prime & finish paint line, identified as 6-001 with a maximum capacity of 28.2 gallons/hr of paint, using dry filters as particulate control.

Steel grit blaster, identified as 6-002 with a maximum capacity of 67,200 lbs /hr of steel grit to blast metal frames, using a baghouse (6-002a) as particulate control.

Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs /hr of steel grit to blast metal frames, using a baghouse (6-003a) as particulate control.

Area welding identified as 6-004 with a maximum capacity of 249 lbs/hr of weld wire.

Plant 7 consisting of:

Converter dolly paint booth & oven, identified as 7-001 with a maximum capacity 10.2 gal/hr of paint, using dry filters as particulate control.

Hub paint booth, identified as 7-002 with a maximum capacity of 4.7 gal/hr of paint, using dry filters as particulate control.

Plant 8 consisting of:

29 million BTU/hr wood-fired dutch oven boiler, with alternate natural gas fuel, identified as 8-006, particulate emissions controlled by a multi-cyclone collector, exhausting through 8-006a.

Primer booth & oven, identified as 8-001 with a maximum capacity 13.8 gal/hr of paint, using dry filters as particulate control.

Finish paint booth, identified as 8-002 with a maximum capacity of 10.2 gal/hr of paint, using dry filters as particulate control.

Small paint booth, identified as 8-003 with a maximum capacity 33.0 gal/hr of paint, using dry filters as particulate control.

Glass & steel shot blaster, identified as 8-004 with a maximum capacity of 2,520 lbs /hr of glass or steel shot, using a baghouse 8-004a as particulate control.

Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs /hr steel shot, using a baghouse 8-005a as particulate control.

Area welding identified as 8-007 with a maximum capacity of 1096.7 lbs/hr of weld wire.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.
- (c) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (f) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (j) Closed loop heating and cooling systems.
- (k) Any of the following structural steel and bridge fabrication activities:
Cutting 200,00 linear feet or less of one inch (1") plate or equivalent.
Using 80 tons or less of welding consumables.
- (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Paved and unpaved roads and parking lots with public access.
- (n) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (o) Vents from ash transport systems not operated at positive pressure.
- (p) Board coating booth (air atomized), identified as 5-011 with a maximum capacity to coat 1,750 linear feet per hour of wood floor boards for trailers, using dry filters as particulate control.

- (q) Infrared cure equipment
- (r) Blow down from any of the following: sight glass, boiler, cooling tower, compressors, or pumps.
- (s) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, or woodworking operations.
- (t) Filter media changeout.
- (u) Painting operation that has the potential to emit less than the 5 tons per year of particulate matter (PM) and 10 tons per year of volatile organic compounds (VOC).
- (v) Woodworking operation that has the potential to emit less than 5 tons per year of particulate matter (PM).

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) OP 911-291-0091 issued on May 18, 1989;
- (b) CP 181-2618-00016 issued on March 3, 1993;
- (c) CP 181-3416-00016 issued on February 2, 1995;
- (d) CP181-4847-00016 issued on October 19, 1995;
- (e) CP 181-4762-00016 issued on November 22, 1995;
- (f) CP 181-4939-00010 issued on December 12, 1995;
- (g) CP 181-4987-00016 issued on April 16, 1996;
- (h) CP 181-6262-00016 issued on November 12 1996;
- (i) CP 91-0990-0087 issued on December 4, 1986;
- (j) CP 181-3664-00010 issued on February 1, 1995
- (k) Significant Permit Modification 181-10616-00016 issued on October 5, 1999.

Conditions from previous existing permits were incorporated into this Part 70 permit, except modifications described below.

Numerical limitations from the previous existing construction permits were incorporated into the Part 70 permit, except limits from:

- (a) CP 181-6262-00016 issued November 12, 1996, which limited Plant 8 cross member paint booth to 100 tons per year of Volatile Organic Compounds. This paint booth has been dismantled and removed from the HPA Monon property.
- (b) CP 181-2618-00016 issued March 3, 1993, for the expansion of Plant 6 chassis booth, identified as 6-001. The production limitation of 5 parts per hour has been removed and replaced with a limitation of less than 250 tons per year of VOC.
- (c) CP 181-3416-00016 issued Feb 2, 1995, for multiple sources in which all production limits have been removed and replaced with the following emission limits:
 - 1) Plant 7 Hub Paint Booth, identified as 7-002, production limitation of 35 units per hour has been removed. Plant 7 Converter Dolly Paint Booth, identified as 7-001, production limitation of 6.5 units per hour has been removed and replaced with an emission limitation of 25 tons per year of VOC.

- 2) Plant 8 Coupler Paint Booth, identified as 8-001, production limitation of 3 units per hour has been removed. Plant 8 Module Paint Booth, identified as 8-001, production limitation of 9 units per hour has been removed and replaced with an emission limitation of 84 tons per year of VOC.
- 3) Plant 2 Paint Booth, identified as 2-001, production limitation of 2 units per hour has been removed and replaced with an emission limitation of 60 tons per year of VOC.
- (d) CP 181-4987-00016 issued April 16, 1996 for the Plant 8 small paint booth, identified as 8-003. The production limitation of 6 trailers per hour has been removed and replaced with an emission limitation of 40 tons per year of VOC.
- (e) CP 181-3416-00016 issued February 2, 1995, for the following sources:
 - 1) Plant 6 steel shot blaster, identified as 6-002. The Particulate Matter emission rate of 41.0 pounds per hour, was calculated based on the total process weight rate of 67,200 pounds per hour. This limitation replaces a rate that was based on a process make up rate.
 - 2) Plant 8 steel shot blaster, identified as 8-005. The Particulate Matter emission rate of 14.7 pounds per hour, was calculated based on the total process weight rate of 13,500 pounds per hour. This limitation replaces a rate that was based on a process make up rate.
- (f) CP 181-2618-00016 issued on March 3, 1993 for the Plant 6 steel shot blaster, identified as 6-003. The Particulate Matter emission rate of 45.3 pounds per hour was calculated based on the total process weight rate of 108,000 pounds per hour. This limitation replaces a rate that was based on a process make up rate.
- (g) CP- 181-3664-00010 issued February 1, 1995, for the following sources:
 - 1) The Particulate Matter emission rate of 14.1 pounds per hour, for the wood working operations identified as 5-003, was calculated based on the total process weight rate of 12,600 pounds per hour.
 - 2) The Particulate Matter emission rate of 32.3 pounds per hour, for the planer operations identified as 5-004, was calculated based on the total process weight rate of 43,500 pounds per hour.
- (h) Additional modifications of the previous existing construction permits were made for the following conditions:
 - 1) Plant 8 Boiler, identified as 8-006, monitoring method using wood burn rate has been removed and replaced with a requirement to continuously record steam production.
 - 2) CP 181-4762-00016 and Plant 8 Part70 Modification 181-10616-00016 requires multicyclone removal percent control efficiency. This has been removed due to physical limitations of the existing equipment, once the equipment is installed there is no way to measure the efficiency.
 - 3) CP-181-4987-00016 requirements to tag filters and maintain 24 months of records has been removed and replaced with Preventive Maintenance Plan requirements.
 - 4) CP-91-09-90-0087 indicated average boiler output of 14,000 pounds of steam per hour. This description has been modified to reflect the maximum boiler BTU input rating of 30 MMBTU per hour.

Enforcement

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

Potential Emission Calculations

See Appendix A, page 1 of 1 of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential To Emit (tons/year)
PM	greater than 100
PM-10	greater than 100
SO ₂	less than 10
VOC	greater than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Ethyl-benzene	greater than 10, less than 25
Acetaldehyde	less than 25
Benzene	less than 10
Xylenes (isomers & mixtures)	greater than 10, less than 100
Chromium Compounds	less than 10
Lead Compounds	less than 10
Cyanide Compounds	less than 10
Chlorine	less than 10
Formaldehyde	less than 10
Methyl Ethyl Ketone	less than 10
Glycol Ethers	greater than 10, less than 25
Manganese Compounds	greater than 10, less than 25
Naphthalene	less than 10
Methylene Chloride	less than 10
Toluene	greater than 10, less than 25
Methyl Isobutyl Ketone	greater than 10, less than 25
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC's and PM-10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	27.26
PM-10	27.26
SO ₂	.29
VOC	157.75
CO	13.96
NO _x	0.75

Acetaldehyde	0.004
Benzene	0.020
Chlorine	0.015
Ethylbenzene.	4.740
Formaldehyde	0.020
Methyl Ethyl Ketone	0.340
Methyl Isobutyl Ketone	2.610
Methylene Chloride	0.001
Naphthalene	0.007
Toluene	5.880
Xylenes (isomers & mixtures)	27.000
Chromium Compounds	0.040
Cyanide Compounds	0.060
Glycol Ethers	1.350
Lead Compounds	0.001
Manganese Compounds	1.130
Nickel Compounds	0.015
hexane	0.090

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Finish paint booth				80.0 ⁵			
Primary paint booth				60.0 ⁵			
Converter dolly paint booth & oven				25.0 ³			
Paint booth				40.0 ²			
shot blaster		14.9 ⁴					
Primer booth & oven				84.0 ¹			
Applicator of spray operations, chassis prime and finish paint line				250 ⁶			
wood fired boiler		14.1 ⁷					
total		29		455			

¹ Limit was established pursuant to CP number 181-3416 issued on February 2, 1995

² Limit was established pursuant to CP number 181-4987 issued on April 16, 1996

³ Limit was established pursuant to CP number 181-3416 issued on February 2, 1995

⁴ Limit was established pursuant to CP number 181-4847 issued on October 19, 1995

⁵ Limit was established pursuant to CP number 181-6262 issued on November 12, 1996

⁶ Limit was established pursuant to CP number 181-2618 issued on March 3, 1993 the 5 parts per hour limit is now a less than 250 tons/year limit.

⁷ Limit was established pursuant to Part 70 Modification number 181-9293 issued on October 15, 1999

County Attainment Status

The source is located in White County.

Pollutant	Status attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. White County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

This facility is subject to the New Source Performance Standards, 326 IAC 12, (40 CFR 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units). The requirements are being reiterated here for convenience:

40 CFR Part 60.40c -- Applicability

This standard is applicable to boilers constructed after June 9, 1989, and maximum design capacity between 10 MMBTU/hr and 100 MMBTU/hr. Therefore, the 29 million BTU/hr wood-fired dutch oven boiler identified as 8-006 constructed on October 15, 1999 is subject to this standard. The 29 million BTU/hr wood fired dutch oven boiler identified as 5-002 was constructed in February 1995 and is also subject to this standard.

The 30 million BTU/hr boiler identified as 5-001 was constructed in 1970, which is prior to the applicability of the rule.

40 CFR Part 60.42c - Standard for SO₂

No standard has been established for wood fired boilers.

40 CFR Part 60.43c - Standard for PM

The standard established for PM is for 30 MMBTU/hr boilers or greater constructed after June 9, 1989. The two 29 million BTU/hr wood fired boilers identified as 8-006 and 5-002 were constructed after June 9, 1989 but are not subject to this standard because they are less than 30 million BTU/hr.

40 CFR parts 60.42c, 60.43c, 60.44c, 60.45c, 60.46c and 60.47c.

The 29 MMBTU/hr boilers identified as 8-006 and 5-002 are not subject to the performance testing or monitoring requirements under this section subpart 60.42c, 60.43c, 60.44c 60.45c, 60.46c or 60.47c

40 CFR 60.48c subpart Dc

The New Source Performance Standard (NSPS) 40 CFR Part 60.48c(g) Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units) and 326 IAC 12 (New Source Performance Standards), the permittee shall maintain a monthly record of the amount of fuel combusted for the two (2) 29 mm Btu/hr wood fired dutch oven boilers identified as 8-006 and 5-002. Pursuant to 326 IAC 2-7-5(3)(B), all records shall be maintained for a period of five (5) years following the date of such record.

40 CFR Part 63 subpart T

- (a) The halogenated solvent cleaner identified as 1-004 is subject to this rule. The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.
- (b) Except as noted in appendix C (General Provisions Applicability to Subpart T) of this subpart, the provisions of subpart A of this part (General Provisions) apply to owners or operators of any solvent cleaning machine meeting the applicability criteria of paragraph (a) of this section.
- (c) Except as provided in paragraph (g) of this section, each solvent cleaning machine subject to this subpart that commences construction or reconstruction after November 29, 1993 shall achieve compliance with the provisions of this subpart immediately upon start-up or by December 2, 1994, whichever is later.
- (d) Except as provided in paragraph (g) of this section, each solvent cleaning machine subject to this subpart that commenced construction or reconstruction on or before November 29, 1993 shall achieve compliance with the provisions of this subpart no later than December 2, 1997.

- (e) In delegating implementation and enforcement authority to a State under section 112(d) of the Act, the authority contained in paragraph (f) of this section shall be retained by the Administrator and not transferred to a State.
- (f) The authority conferred in Sec. 63.463(d)(9) and Sec. 63.469 will not be delegated to any State.
- (g) Each continuous web cleaning machine subject to this subpart shall achieve compliance with the provisions of this subpart no later than December 2, 1999.

Standards for halogenated solvent cleaner, [326 IAC 20-6-1] and 40 CFR Part 63.462

- (a) Each owner or operator of an immersion batch cold solvent cleaning machine shall comply with the requirements specified in paragraph (a)(1) or (a)(2) of this section.
 - (1) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal, and a water layer at a minimum thickness of 2.5 centimeters (1.0 inch) on the surface of the solvent within the cleaning machine, or
 - (2) Employ a tightly fitting cover that shall be closed at all times except during parts entry and removal and a freeboard ratio of 0.75 or greater
- (b) Each owner or operator of a remote-reservoir batch cold solvent cleaning machine shall employ a tightly fitting cover over the solvent sump that shall be closed at all times except during the cleaning of parts.
- (c) Each owner or operator of a batch cold solvent cleaning machine complying with paragraphs (a)(2) or (b) of this section shall comply with the work and operational practice requirements specified in paragraphs (c)(1) through (c)(8) of this section.
 - (1) All waste solvent shall be collected and stored in closed containers. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.
 - (2) If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard area of the solvent cleaning machine.
 - (3) The owner or operator shall drain solvent cleaned parts for 15 seconds or until dripping has stopped, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while draining.
 - (4) The owner or operator shall ensure that the solvent level does not exceed the fill line.
 - (5) Spills during solvent transfer shall be wiped up immediately. The wipe rags shall be stored in covered containers meeting the requirements of paragraph (c)(1) of this section.
 - (6) When an air- or pump-agitated solvent bath is used, the owner or operator shall ensure that the agitator is operated to produce a rolling motion of the solvent but not observable splashing against tank walls or parts being cleaned.
 - (7) The owner or operator shall ensure that, when the cover is open, the cold cleaning machine is not exposed to drafts greater than 40 meters per minute (132 feet per minute), as measured between 1 and 2 meters (3.3 and 6.6 feet) upwind and at the same elevation as the tank lip.
 - (8) Sponges, fabric, wood, and paper products shall not be cleaned.

- (d) Each owner or operator of a batch cold cleaning machine shall submit an initial notification report as described in Sec. 63.468 (a) and (b) and a compliance report as described in Sec. 63.468(c).

63.468 Reporting requirements.

- (a) Each owner or operator of an existing solvent cleaning machine subject to the provisions of this subpart shall submit an initial notification report to the Administrator no later than August 29, 1995. This report shall include the information specified in paragraphs (a)(1) through (a)(6) of this section.
 - (1) The name and address of the owner or operator.
 - (2) The address (i.e., physical location) of the solvent cleaning machine(s).
 - (3) A brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line or cold in-line), solvent/air interface area, and existing controls.
 - (4) The date of installation for each solvent cleaning machine or a letter certifying that the solvent cleaning machine was installed prior to, or after, November 29, 1993.
 - (5) The anticipated compliance approach for each solvent cleaning machine.
 - (6) An estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
- (b) Each owner or operator of a new solvent cleaning machine subject to the provisions of this subpart shall submit an initial notification report to the Administrator. New sources for which construction or reconstruction had commenced and initial startup had not occurred before December 2, 1994, shall submit this report as soon as practicable before startup but no later than January 31, 1995. New sources for which the construction or reconstruction commenced after December 2, 1994, shall submit this report as soon as practicable before the construction or reconstruction is planned to commence. This report shall include all of the information required in Sec. 63.5(d)(1) of subpart A (General Provisions), with the revisions and additions in paragraphs (b)(1) through (b)(3) of this section.
 - (1) The report shall include a brief description of each solvent cleaning machine including machine type (batch vapor, batch cold, vapor in-line, or cold-line), solvent/air interface area, and existing controls.
 - (2) The report shall include the anticipated compliance approach for each solvent cleaning machine.
 - (3) In lieu of Sec. 63.5(d)(1)(ii)(H) of subpart A of this part, the owner or operator must report an estimate of annual halogenated HAP solvent consumption for each solvent cleaning machine.
- (c) Each owner or operator of a batch cold solvent cleaning machine subject to the provisions of this subpart shall submit a compliance report to the Administrator. For existing sources, this report shall be submitted to the Administrator no later than 150 days after the compliance date specified in Sec. 63.460(d). For new sources, this report shall be submitted to the Administrator no later than 150 days after startup or May 1, 1995, whichever is later. This report shall include the requirements specified in paragraphs (c)(1) through (c)(4) of this section.
 - (1) The name and address of the owner or operator.
 - (2) The address (i.e., physical location) of the solvent cleaning machine(s).

- (3) A statement, signed by the owner or operator of the solvent cleaning machine, stating that the solvent cleaning machine for which the report is being submitted is in compliance with the provisions of this subpart.
- (4) The compliance approach for each solvent cleaning machine.

State Rule Applicability - Entire Source

326 IAC 2-2 and 40 CFR 52.21 (Prevention of Significant Deterioration)

This source is a major source because the total source potential to emit of VOC is greater than 250 tons per year.

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on December 12, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 12, 1997 and the revised version on January 3, 2000. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC's. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source.

The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-1-4.1 (New Source Toxic Controls)

326 IAC 2-1-4.1 (New Source Toxic Controls) does not apply to this facility because everything was constructed prior to the June 29, 1998 except the plant 8 boiler which does not by itself have potential to emit HAPs.

326 IAC 6-2-1 particulate emissions limitations for sources of indirect heating

The Permittee is not required to test boilers 5-001 and 5-002 by this permit because these had initial stack testing.

326 IAC 8-1-6 (VOC Regulations - General Reduction Requirements for New Sources or Facilities)

This source and some of the emission VOC units were constructed after January 1, 1980, Therefore 326 IAC 8-1-6 Best Available Control Technology is applicable, But does not apply because 8-2-9 rules are applicable.

326 IAC 8-3-1 (organic solvent degreasing operations)

This facility was constructed after January 1, 1980, Therefore 8-3-1 organic solvent degreasing operations is applicable.

The owner or operator of a organic solvent degreasing: cold cleaning facility identified as 1-004 shall:

- (1) equip the cleaner with a cover;
- (2) equip the cleaner with a facility for draining cleaned parts;
- (3) close the degreaser cover whenever parts are not being handled in the cleaner;
- (4) drain the cleaned parts for at least (15) fifteen seconds or until dripping ceases;
- (5) provide a permanent, conspicuous label summarizing the operation requirements
- (6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations),

The volatile organic compound (VOC) content of coating delivered to the applicator at the finish paint booth 1-001,, primary paint booth 2-001, paint booth 1-003, caulking and gluing 2-002, chassis & prime line 6-001a,c, converter dolly paint booth 7-001, hub paint booth 7-002, Primer booth 8-001, finish paint booth 8-002 and small paint booth 8-003, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

326 IAC 8-6 (Organic Solvent Emission Limitation)

This source commenced operation after October 7, 1974 and before January 1, 1980 but did not have VOC's greater than 100 tons per year, therefore 326 IAC 8-6 is not applicable.

326 IAC 6-2-1 (Particulate Emissions Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-1:

Boilers	Date of construction	Heat put capacity MMBtu/hr	Allowable limit lb/MMBtu
Boiler 500-1	Constructed and permitted October 15, 1975.	30	0.80
Boiler 500-2	181-3664-00010 issued on February 1, 1995	29	0.38
*Boiler 800-6 See explanation below	181-9293 issued on October 15, 1999	29	0.42

- (a) The 30 MMBTU/hr wood fired boiler identified as 5-001 constructed in 1970 is subject 326 IAC 6-2-3(d).

This limitation is based on the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

$$C = 50 \text{ u/m}^3$$

Pt = emission rate limit (lbs/MMBTU)

Q = total source heat input capacity (MMBTU/hr)

N = number of stacks

a = plume rise factor (0.67)

h = stack height (ft)

$$Pt = \frac{(50 \text{ u/m}^3)(.67)(23.5)}{(76.5)(30^{0.75})(1^{0.25})} = \frac{(50 \text{ u/m}^3)(.67)(25)}{(76.5)(12.81)(1)} = \frac{837.5}{979.9} = .85 \text{ lb of PM/MMBTU}$$

Pt = 0.85 lb of PM/MMBTU (truncated to .80)

(by the definition of 326 IAC 6-2-3(d) any value over .80 has to be truncated to .80, therefore the allowable limit shall be .80)

- (b) The 29 MMBTU/hr wood fired boiler identified as 5-002 controlled by a cyclone constructed on February 1, 1995 is subject 326 IAC 6-2-4.

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{lbs of PM emitted/MMBTU heat input}$$

Q = total source maximum operating capacity, MMBTU/hr

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(29 + 30^{0.26})}$$

Pt = 0.38 lb of PM/MMBTU

$$PM = (0.38 \text{ lb/MMBTU}) \times (29 \text{ MMBTU/hr}) = 9.9 \text{ lbs/hr}$$

* The plant 5 boilers 5-001 and 5-002 were not added into the Plant 8 boiler calculation below, because at the time of construction plant 5 was not considered part of the six plants that now make up one source. When HPA bought the company, there was one 8.38 MMBTU/hr boiler at the facility that was never used and was removed by HPA Monon.

- (c) The 29 MMBTU/hr wood fired boiler identified as 8-006 controlled by a cyclone constructed on October 15, 1999 is subject 326 IAC 6-2-4.

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{lbs of PM emitted/MMBTU heat input}$$

Q = total source maximum operating capacity, MMBTU/hr

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(29 + 8.38^{0.26})}$$

Pt = 0.42 lb of PM/MMBTU

$$PM = (0.42 \text{ lb/MMBTU}) \times (29 \text{ MMBTU/hr}) = 12.2 \text{ lbs/hr}$$

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the hog grinder 5-003 and woodworking 5-004, facilities shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the hog grinder and woodworking are in operation, in order to comply with these limits.

- (b) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel grit blaster, 6-002, shall not exceed 41.0 pounds per hour when operating at a process weight rate of 67,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the steel grit blaster are in operation, in order to comply with these limits.

- (c) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel shot blaster, 6-003 facilities shall not exceed 45.3 pounds per hour when operating at a process weight rate of 108,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the steel shot blaster are in operation, in order to comply with these limits.

- (d) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the glass & steel shot blaster, 8-004a, facilities shall not exceed 4.8 pounds per hour when operating at a process weight rate of 2520 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the glass & steel shot blaster are in operation, in order to comply with these limits.

- (e) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the large steel shot blaster, 8-005a, facilities shall not exceed 14.7 pounds per hour when operating at a process weight rate of 13,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the large steel shot blaster is in operation, in order to comply with these limits.

- (f) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the planer, 5-004, facilities shall not exceed 32.2 pounds per hour when operating at a process weight rate of 43,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The baghouse shall be in operation at all times the planer are in operation, in order to comply with these limits.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis.

All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

1. The boiler identified as 8-006 operation has applicable compliance monitoring conditions as specified below:
 - (a) Continuous Chart Recorder Required
The amount of steam produced by this facility shall be continuously monitored and recorded by use of a continuous chart recorder.

This requirement is necessary in order to ensure that particulate matter of less than 10 microns in diameter (PM10) from this facility is limited to less than 15 tons per year, and that the Prevention of Significant Deterioration (PSD) rules are not applicable.
 - (b) Visible Emissions Notations for facilities 5-001, 5-002 and 8-006.
 - (1) Daily visible emission notations of the stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
 - (2) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- (3) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
 - (4) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
 - (5) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.
- 2. The surface coating has applicable compliance monitoring conditions as specified below:
 - (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while one or more of the booths are in operation.
 - (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.
 - (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of this semi tractor trailer manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No.T181-9293-00016.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: HPA Monon Corporation
Source Location: 6929 N. U.S. Hwy 421, Monon, Indiana 47959-0655
County: White
SIC Code: 3715
Operation Permit No.: T181-9293-00041
Permit Reviewer: Holly M. Stockrahm

On October 15, 2000, the Office of Air Quality (OAQ) had a notice published in the Monticello Herald Journal, Monticello, Indiana, stating that HPA Monon Corporation had applied for a Part 70 Operating Permit to operate a semi tractor trailer manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Based on the comments received from the source by e-mail on November 10, 2000, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

Comment 1:

In Section A.1, the mailing address reads "One Tower Drive", HPA Monon requests the mailing address "One Water Tower Drive.

Response to Comment 1:

OAQ agrees. The Mailing Address has been changed as follows:
Mailing Address: One **Water** Tower Drive, **P.O. Box 655**, Monon, Indiana 47959

Comment 2:

The paragraph describing Plant 5 that begins, "Plant 5 is located on property with less than (2) miles from the Main Facility location." HPA Monon requests the word "with" be removed from the sentence for grammatical purposes.

Response to Comment 2:

OAQ agrees. The sentence has been changed as follows:
Plant 5 is located on property ~~with~~ less than (2) two miles from the Main Facility location.

Comment 3:

The third paragraph under the Plant 5 heading reads "Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses as particulate control. HPA Monon requests the two baghouse numbers (5-003a and 5-003b) be added after the word baghouses. This would keep the permit consistent throughout.

Response to Comment 3:

OAQ agrees. The description shall be changed as follows:
Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses (**5-003a and 5-003b**) as particulate matter control.

Comment 4:

In Section A.2, the fourth paragraph under the Plant 5 section reads, "One planer identified as 5-004 with a maximum capacity to plane 43,500 lb/hr and excess truck floors, using a baghouse (5-004a) as particulate matter control." HPA Monon requests the phrase "and excess truck floors" be removed and replaced with the phrase, "of raw wood." The planer in question is the first stage in the wood flooring process and handles incoming raw wood. This planer does not handle any processes that would include excess truck floors.

Response to Comment 4:

OAQ agrees. The description shall be changed as follows:
One planer identified as 5-004 with a maximum capacity to plane 43,500 lb/hr ~~and excess truck floors of raw wood~~, using a baghouse (5-004a) as particulate matter control.

Comment 5:

In Section A.2, the third paragraph under the Plant 6 section reads, "Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs/hr of steel grit to blast metal frames, using a baghouse (6-003a) as particulate control." HPA Monon requests the word, "frames" be removed and replaced with the word, "parts." The shot blaster stated above is used to blast metal parts that can be used to build frames and other assemblies, but does not blast an entire frame.

Response to Comment 5:

OAQ agrees. The description shall be changed as follows:
Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs /hr of steel grit to blast metal ~~frames~~ **parts**, using a baghouse (6-003a) as particulate control.

Comment 6:

In the last paragraph exhaust number (8-004a) is not contained in parenthesis. HPA Monon requests this number be contained within parenthesis to be consistent with the rest of the permit.

Response to Comment 6:

OAQ agrees. The last paragraph has been changed as follows:
Glass & steel shot blaster, identified as 8-004 with a maximum capacity of 2,520 lbs /hr of glass or steel shot, using a baghouse (8-004a) as particulate control.

Comment 7:

In the first paragraph exhaust number 8-005a is not contained within parenthesis. HPA Monon requests this number be contained within parenthesis to be consistent with the rest of the permit.

Response to Comment 7:

OAQ agrees. The first paragraph has been changed as follows:
Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs /hr steel shot, using a baghouse (8-005a) as particulate control.

Comment 8:

HPA Monon asks that the following items are added to the insignificant activities list in Section

A.3.

- (w) Cleaners and solvents
- (x) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAP's.
- (y) Water based adhesives that are less than 5% by volume VOC excluding HAP's.
- (z) Stationary fire pumps.

Response to Comment 8:

OAQ agrees. These items have been added to Section A.3.

Comment 9:

In section B.14 under the second full paragraph that starts, "Numerical Limitations", the second sentence in item (b) reads, "The production limitation of 5 parts per hour has been removed and replaced with its calculated corresponding emission limitation of 269 tons per year of VOC." HPA Monon requests that IDEM change the paragraph in item (b) to read: "The production limitation of 5 parts per hour has been removed and replaced with a limit of 250 tons per year of VOC. This limit is less than its calculated corresponding emission limitation of 269 tons per year." This change will make section B.14 consistent with the rest of the permit and technical support document concerning the Plant 6 VOC limitation.

Response to Comment 9:

OAQ agrees. B.14(c)(1)(B) has been revised as follows:

- (B) CP 181-2618-00016 issued March 3, 1993, for the Plant 6 chassis booth, identified as 6-001. The production limitation of 5 parts per hour has been removed and replaced with its calculated corresponding emission limitation of ~~269~~ **250** tons of VOC per **consecutive 12 month period rolled on a monthly basis.**

Comment 10:

In Section B.14 under the second full paragraph that starts, "Numerical Limitation", item (c) reads, "Plant 8 Coupler Paint Booth, identified as 8-001, production limitation...", HPA Monon requests that the source number "8-001" be replaced with the correct source number of "8-002."

Response to Comment 10:

OAQ agrees. The description is revised as follows:

Plant 8 Coupler Paint Booth, identified as 8-00~~1~~**2**, production limitation of 3 units per hour has been removed, the description "with a maximum capacity of 10.2 gal/hr" will remain. Plant 8 Module Paint Booth, identified as 8-001, production limitation of 9 units per hour has been removed and replaced with an emission limitation of 84 tons per year of VOC.

Comment 11:

In Section D.1.4 item (f) reads, "Pursuant to 181-2618-00016, issued on March 3, 1993, limited to 5 parts per hour." HPA Monon requests that the phrase "limited to 5 parts per hour" be removed. IDEM has determined this limitation is being removed and replaced with an emission limitation as stated in section B.14 of this permit.

Response to Comment 11:

OAQ agrees. Section D.1.4(f) has been changed as follows:

- (f) Pursuant to 181-2618-00016, issued on March 3, 1993 ~~limited to 5 parts per hour.~~

- (1) the total amount of VOC delivered to the applicator of spray operations, chassis prime and finish paint line, identified as 6-001, shall not exceed 250 tons per consecutive 12 month period rolled on a monthly basis.

Comment 12:

In the Section D.2 Facility Description box, the first paragraph under the Plant 5 description reads, "Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses as particulate matter control." HPA Monon requests that the two baghouse number (5-003a and 5-003b) be added after the word baghouses. This would keep the permit consistent throughout.

Response to Comment 12:

OAQ agrees. The description has been changed as follows:

Plant 5

Hog grinder and woodworking operations identified as 5-003, with a maximum capacity to process 12,600 lbs/hr of wood to produce truck floors, using two baghouses (**5-003a and 5-003b**) as particulate matter control.

Comment 13:

In the Section D.2 Facility Description box, the first paragraph under the Plant 6 description reads, "Steel shot blaster, identified as 6-002 with a maximum capacity of 67,200 lbs/hr of steel grit to blast metal frames, using a baghouse as particulate control." HPA Monon requests IDEM add the baghouse number (6-002a). This would keep the permit consistent throughout.

Response to Comment 13:

OAQ agrees. The first paragraph under the Plant 6 description has been changed as follows:

Plant 6

Steel grit blaster, identified as 6-002 with a maximum capacity of 67,200 lbs /hr of steel grit to blast metal frames, using a baghouse (6002a) as particulate control.

Comment 14:

In the Section D.2 Facility Description box, the second paragraph under the Plant 6 description reads, "Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs/hr of steel grit to blast metal frames, using a baghouse as particulate control." HPA Monon requests that the word, "frames" be removed and replaced with the word "parts" and add the baghouse number (6-003a). The shot blaster stated above is used to blast metal parts that can be used to build frames and other assemblies, but does not blast an entire frame.

Response to Comment 14:

OAQ agrees. The second paragraph under the Plant 6 description has been changed as follows:

Plant 6

Steel shot blaster, identified as 6-003 with a maximum capacity of 108,000 lbs /hr of steel grit to blast metal **frames parts**, using a baghouse (**6-003a**) as particulate control.

Comment 15:

In the Section D.2 Facility Description box, the first paragraph under the Plant 8 description does not have the baghouse 8-004a in parenthesis. HPA Monon requests that IDEM add parenthesis around the exhaust number (8-004a) to keep the formatting consistent throughout the permit.

Response to Comment 15:

OAQ agrees. Section D.2 Plant 8 first paragraph has been changed as follows:

Plant 8

Glass & steel shot blaster, identified as 8-004 with a maximum capacity of 2,520 lbs /hr of steel or glass shot, using a baghouse (8-004a) as particulate control.

Comment 16:

In the Section D.2 Facility Description box, the second paragraph under the Plant 8 description reads, "Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs/hr of steel or glass shot, using a baghouse 8-005a as control." HPA Monon request that the phrase, "or glass" be removed and parenthesis be added to the baghouse number. The shot blaster stated above is designed to use only steel shot. Glass shot is only used in the shot blaster identified as 8-004.

Response to Comment 16:

OAQ agrees. Section D.2 Plant 8 second paragraph has been changed as follows:

Plant 8

Large steel shot blaster, identified as 8-005 with a maximum capacity of 13,500 lbs /hr of steel ~~or glass~~ shot, using a baghouse (8-005a) as particulate control.

Comment 17:

In Section D.2.1, the paragraph under item (a) reads, "Pursuant to 326 IAC 6-3, the allowable PM emission rate from the hog grinder 5-003 and woodworking 5-004, facilities shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour." HPA Monon requests that IDEM change the paragraph to read, "Pursuant to 326 IAC 6-3, the allowable emission rate from the woodworking operations and hog grinder, identified as 5-003, shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour." For the record, the hog grinder and the woodworking operations are located in the same building and are exhausted through the same baghouses. This process has the source number of 5-003. A separate wood planer located in a different building and exhausted through a different baghouse has the source number of 5-004. These are two separate processes that are not combined in the equation. The 14.1 pounds per hour emission limit only applies to source 5-003.

Response to Comment 17:

OAQ agrees. Condition D.2.1 shall be changed as follows:

D.2.1 Particulate Matter [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the hog grinder ~~5-003~~ and woodworking ~~5-004~~, facilities, **identified as 5-003**, shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Comment 18:

In Section D.2.1 item (d) reads, "Pursuant to 6-3 the allowable emission rate for the glass and steel shot blaster, 8-004a,..." HPA Monon request that IDEM remove the lower case "a" following the source number 8-004. The lower case "a" refers to the baghouse and not the actual shot blaster.

Response to Comment 18:

OAQ agrees. The condition D.2.1 (d) has been changed as follows:

- (d) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the glass & steel shot blaster, 8-004a, facilities shall not exceed 4.8 pounds per hour when operating at a process weight rate of 2520 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

~~Interpolation and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 19:

In Section D.2.1 item (e) reads, "Pursuant to 6-3 the allowable emission rate for the glass and steel shot blaster, 8-005a,..." HPA Monon request that IDEM remove the lower case "a" following the source number 8-004. The lower case "a" refers to the baghouse and not the actual shot blaster.

Response to Comment 19:

OAQ agrees. Condition D.2.1 (e) has been changed as follows:

- (e) Pursuant to 326 IAC 6-3 the allowable PM emission rate from the large steel shot blaster, 8-005a, facilities shall not exceed 14.7 pounds per hour when operating at a process weight rate of 13,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

~~Interpolation and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 20:

HPA Monon requests that IDEM move item (f) under section D.2.1 to item (b). This would keep the sources from the same plants together and reduce confusion in reading the permit. Accordingly move item (b), (c), (d), and (e) to items (c), (d), (e), and (f) respectively.

Response to Comment 20:

OAQ agrees. Condition D.2.1 has been rearranged as follows:

D.2.1 Particulate Matter [326 IAC 6-3]

- (a) Pursuant to 326 IAC 6-3, the allowable PM emission rate from the hog grinder and woodworking facilities, identified 5-003, shall not exceed 14.1 pounds per hour when operating at a process weight rate of 12,600 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (b) ~~(f)~~ Pursuant to 326 IAC 6-3 the allowable PM emission rate from the planer, 5-004, facilities shall not exceed 32.2 pounds per hour when operating at a process weight rate of 43,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (c) ~~(b)~~ Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel grit blaster, 6-002, shall not exceed 41.0 pounds per hour when operating at a process weight rate of 67,200 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (d) ~~(e)~~ Pursuant to 326 IAC 6-3, the allowable PM emission rate from the steel shot blaster, 6-003 facilities shall not exceed 45.3 pounds per hour when operating at a process weight rate of 108,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (e) ~~(d)~~ Pursuant to 326 IAC 6-3 the allowable PM emission rate from the glass & steel shot blaster, 8-004, facilities shall not exceed 4.8 pounds per hour when operating at a process weight rate of 2520 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (f) ~~(e)~~ Pursuant to 326 IAC 6-3 the allowable PM emission rate from the large steel shot blaster, 8-005, facilities shall not exceed 14.7 pounds per hour when operating at a process weight rate of 13,500 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation ~~and extrapolation~~ of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Comment 21:

In Section D.2.4 the paragraph reads, "The baghouse for PM control shall be in operation and control emissions from the grinder and shotblasting at all times the woodworking planer, hog grinder, steel grit blaster, steel shot blaster, glass and steel shot blaster, and large steel shot blaster are in operation." HPA Monon requests two changes to this paragraph. The first change is to change the word "planer" from the phrase, "woodworking planer" to "operations." The second change is to add the phrase, "wood planer" after "hog grinder." The way the paragraph is currently written, it is possible to confuse the woodworking operations and hog grinder, identified as 5-003 in the permit, with the wood planer identified as 5-004 in the permit. The above changes should help to prevent any confusion someone may have in thinking these two sources are one single source.

Response to Comment 21:

OAQ agrees. Condition D.2.4 has been changed as follows:

D.2.4 Particulate Matter (PM)

The baghouse for PM control shall be in operation and control emissions from the grinder & shot blasting at all times the wood working ~~planer~~ **operations**, hog grinder, **wood planer**, steel grit blaster, steel shot blaster, glass & steel shot blaster, and large steel shot blaster are in operation.

Comment 22:

In section D.2.5 the paragraph reads, "An inspection shall be performed each calendar quarter of all bags controlling the grinder and shot blasting at all times that the hog grinder, woodworking planer operations, steel grit blaster, steel shot blaster, glass and steel shot blaster, and large steel shot blaster operation when venting to the atmosphere." HPA Monon requests two changes in this paragraph. The first change is to delete the word "planer" from the phrase "woodworking planer operations." The second is add the phrase "wood planer" between "woodworking operations" and "steel grit blaster." The way the paragraph is currently written, it is possible to confuse the woodworking operations and hog grinder, identified as 5-003 in the permit, with the wood planer identified as 5-004 in the permit. The above changes should help to prevent any confusion someone may have in thinking these two separate sources are one single source.

Response to Comment 22:

OAQ agrees. Condition D.2.5 has been changed as follows:

D.2.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the grinder & shot blasting at all times that the hog grinder, woodworking ~~planer~~ operations, **wood planer**, steel grit blaster, steel shot blaster, glass & steel shot blaster, and large steel shot blaster operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

Comment 23:

In section D.2.7 the paragraph reads, "Daily visible emission notations of the woodworking planer, grinding and blasting stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere...". HPA Monon requests two changes to this paragraph. The first change is to change the word "planer" in the phrase "woodworking planer" to "operations." The second change is to add the phrase "wood planer" between "woodworking operations" and "grinding." The way the paragraph is currently written, it is possible to confuse the woodworking operations, identified as 5-003, and the wood planer, identified as 5-004, in the permit.

Response to Comment 23:

OAQ agrees. Condition D.2.7 has been changed as follows:

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the woodworking ~~planer~~, **operations, wood planer**, grinding and blasting stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

Comment 24:

In Section D.3.1, the regulation cited is [326 IAC 6-2-4]. HPA Monon request that this heading also include [326 IAC 6-2-3] as it applies to one of the boilers.

Response to Comment 24:

OAQ agrees. The citations shall appear as follows:

D.3.1 Particulate Matter Limitations for Indirect Heating [326 IAC 6-2-4][326 IAC 6-2-3]

Comment 25:

In Section D.3.1 item (b) reads, "Pursuant to OP issued in 1975 and 326 IAC 6-2-4, 30 million Btu/hr wood-fired Dutch oven boiler identified as 5-001 was limited to 0.85 lb PM/MMBtu." HPA Monon requests the following changes to this paragraph:

- (1) remove the phrase, "OP issued in 1975 and "
- (2) replace "326 IAC 6-2-4" with "326 IAC 6-2-3:
- (3) replace "0.85 with the correct limitation of "0.60"
- (4) correct the outline formatting

The boiler identified as 5-001 was constructed in 1975, which is after the 1972 cut off date and before the 1983 cut off date. Therefore, 326 IAC 6-2-3(e) applies and limits the particulate matter emissions to 0.60 lb PM/MMBtu.

Response to Comment 25:

OAQ agrees. Condition D.3.1 has been changed as follows:

D.3.1 Particulate Matter Limitations for Indirect Heating [326 IAC 6-2-4] [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-1 (Particulate Limitations for Indirect Heating), the three (3) boilers are limited as follows:

- (a) Pursuant to ~~OP issued in 1975 and~~ 326 IAC 6-2-43, ~~the~~ 30 million BTU/hr wood-fired Dutch oven boiler, **constructed in 1975, and** identified as 5-001 ~~was is~~ limited to ~~0.85~~ **0.60** lb PM/MMBtu,
- (b) Pursuant to CP 181-3664-00010, issued on February 1, 1995, and 326 IAC 6-2-4, ~~the~~ 29 million BTU/hr wood-fired Dutch oven boiler identified as 5-002 is limited to 0.38 lb PM/MMBtu,
- (c) Pursuant to 326 IAC 6-2-4, ~~the~~ 29 million BTU/hr wood-fired Dutch oven boiler identified as 8-006 is limited to 0.42 lb PM/MMBtu.

Comment 26:

In Section D.3.8 item (4) and item (5) are referring to the same record keeping requirements. HPA Monon requests that the items be combined into one sentence reading, "Amount of fuel used per calendar month and per 12 month period."

Response to Comment 26:

OAQ agrees. Condition D.3.8 has been changed as follows:

D.3.8 Record Keeping Requirements [326 IAC 2-17-19]

- (a) To document compliance, the Permittee shall maintain records of the following for the 29 million BTU/hr boiler identified as 8-006:
 - (1) Daily visible emission notations of the stack exhaust.
 - (2) Continuous chart recorder data.
 - (3) Amount of steam produced per calendar month and per 12-month period.
 - (4) ~~Volume of wood used per calendar month and per 12-month period.~~
 - (5) ~~Pursuant to 40 CFR 60.48c,~~ the Permittee shall maintain a ~~monthly~~ record of the amount of fuel combusted **per calendar month and per consecutive 12 month period.** ~~Pursuant to 40 CFR 60.48c.~~
 - ~~(5)(6)~~ All records shall be maintained for a period of five (5) years following the date of such record.
 - ~~(6)(7)~~ All records shall be maintained in accordance with Section C - General Record Keeping Requirements.

Comment 27:

HPA Monon requests the word "Water" be added to the mailing address on page 44 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 27:

OAQ agrees. The Mailing Address on all the report forms has been revised as follows:

Mailing Address: **One Water Tower Drive, P.O. Box 655, Monon, IN 47959-0655**

Comment 28:

HPA Monon requests the word "Water" be added to the mailing address on page 45 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 28:

OAQ agrees. See response to Comment 27.

Comment 29:

HPA Monon requests the word "Water" be added to the mailing address on page 48 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 29:

OAQ agrees. See response to Comment 27.

Comment 30:

HPA Monon requests the source number, "7-001," be added to the facility description on page 48 of 54. The correct Facility would then read, "Facility: Converter Dolly (7-001)."

Response to Comment 30:

OAQ agrees. The Facility description has been changed as follows:

Facility: Converter Dolly **(7-001)**

Comment 31:

HPA Monon requests the word "Water" be added to the mailing address on page 49 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 31:

OAQ agrees. See response to Comment 27.

Comment 32:

HPA Monon requests the source number, "8-003," be added to the facility description on page 49 of 54. The correct Facility would then read, "Facility: Paint Booth (8-003)."

Response to Comment 32:

OAQ agrees. The Facility description has been changed as follows:

Facility: Paint booth **(8-003)**

Comment 33:

HPA Monon requests the word "Water" be added to the mailing address on page 50 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 33:

OAQ agrees. See response to Comment 27.

Comment 34:

HPA Monon requests the source number, "8-001," be added to the facility description on page 50 of 54. The correct Facility would then read, "Facility: Primer Booth (8-001)."

Response to Comment 34:

OAQ agrees. The Facility description has been changed as follows:

Facility: Primer booth **(8-001)**

Comment 35:

HPA Monon requests the word "Water" be added to the mailing address on page 51 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 35:

OAQ agrees. See response to Comment 27.

Comment 36:

HPA Monon requests the source number, "1-001," be added to the facility description on page 51 of 54. The correct Facility would then read, "Facility: Finish Paint Booth (1-001)."

Response to Comment 36:

OAQ agrees. The Facility description has been changed as follows:

Facility: Primer booth **(1-001)**

Comment 37:

HPA Monon requests the word "Water" be added to the mailing address on page 52 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 37:

OAQ agrees. See response to Comment 27.

Comment 38:

HPA Monon requests the source number, "2-001," be added to the facility description on page 52 of 54. The correct Facility would then read, "Facility: Primary Paint Booth (2-001)."

Response to Comment 38:

OAQ agrees. The Facility description has been changed as follows:

Facility: Primary Paint Booth **(2-001)**

Comment 39:

HPA Monon requests the word "Water" be added to the mailing address on page 53 of 54. The correct mailing address should read, "One Water Tower Drive."

Response to Comment 39:

OAQ agrees. See response to Comment 27.

Comment 40:

HPA Monon requests the source number, "6-001," be added to the facility description on page 53 of 54 and the phrase "Applicator of spray operations, chassis prime and finish paint line" be replaced with "Chassis Paint Booth (6-001)." The correct Facility would then read, "Facility: Chassis Paint Booth (6-001)."

Response to Comment 40:

OAQ agrees. The Facility description has been changed as follows:

Facility: ~~Applicator of spray operations, chassis prime and finish paint line~~ **Chassis Paint Booth (6-001)**

Comment 41:

HPA Monon requests the word “Water” be added to the mailing address on page 54 of 54. The correct mailing address should read, “One Water Tower Drive.”

Response to Comment 41:

OAQ agrees. See response to Comment 27.

The source requested various corrections to the Technical Support Document (TSD). The original TSD is maintained as is, and this addendum to the TSD describes the revisions or additions made to the permit. Comment and changes to tables or calculations that affect the applicability of the rules in the permit are described below.

Comment 42:

The table containing individual HAPs information is incorrect. There are currently four (4) individual HAPs listed incorrectly as being less than twenty-five (25) tons per year. HPA Monon requests that IDEM only identify HAPs with either a “less than” or “greater than” determination, but not both. It is not meaningful to show an individual HAP being under 25 tons per year, since the 25 tons per year limit applies to the total of all HAPs. There were also three items left off the list, Nickel and Hexane are both less than 10 tons per year, while Butyl-cello solve is greater than 10 tons per year.

Response to Comment 42:

OAQ agrees. The corrected table is as follows:

Potential To Emit

HAP's	Potential To Emit (tons/year)
Ethyl-benzene	greater than 10
Acetaldehyde	less than 10
Benzene	less than 10
Xylenes (isomers & mixtures)	greater than 10
Chromium Compounds	less than 10
Lead Compounds	less than 10
Cyanide Compounds	less than 10
Chlorine	less than 10
Formaldehyde	less than 10
Methyl Ethyl Ketone	less than 10
Glycol Ethers	greater than 10
Manganese Compounds	greater than 10
Naphthalene	less than 10
Methylene Chloride	less than 10
Toluene	greater than 10
Methyl Isobutyl Ketone	greater than 10
Hexane	less than 10
Nickel Compounds	less than 10
Butyl-cello solve	greater than 10
TOTAL	greater than 25

Comment 43:

HPA Monon requests that IDEM make the following changes to the chart labeled, "Limited Potential to Emit."

- (a) Remove the sentence that reads, "The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units" and replace it with a sentence reading, "The table below summarizes the limited potential to emit for sources with previously existing limits."
- (b) Add the source number to each "Process/facility"
- (c) Remove the "Total" line since it could be interpreted as a total emission allowance
- (d) Footnote 6 currently reads, "Limit was established pursuant to CP number 181-2618 issued on March 3, 1993 the 5 parts per hour limit is now a less than 250 tons per year limit." HPA Monon requests the phrase "5 parts per hour limit" be removed and the phrase "less than" be replaced with "not to exceed."
- (e) Footnote 7 currently reads, "Limit was established pursuant to Part 70 Modification number 181-9293 issued on October 15, 1999, with both the Modification number and the date being incorrect. The correct modification number is 181-10616 and the correct date is October 5, 1999."

Response to Comment 43:

OAQ does not agree with request (a) as it does not add any clarity, but agrees to requests (b) through (e), the revised table is as follows:

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Finish paint booth (1-001)				80.0 ⁵			
Primary paint booth (2-001)				60.0 ⁵			
Converter dolly paint booth (7-001)				25.0 ³			
Paint booth (8-003)				40.0 ²			
shot blaster (8-004)		14.9 ⁴					
Primer booth (8-001)				84.0 ¹			
Chassis Paint Booth (6-001)				250 ⁶			
wood fired boiler (8-006)		14.1 ⁷					

¹ Limit was established pursuant to CP number 181-3416 issued on February 2, 1995.

² Limit was established pursuant to CP number 181-4987 issued on April 16, 1996.

- ³ Limit was established pursuant to CP number 181-3416 issued on February 2, 1995.
⁴ Limit was established pursuant to CP number 181-4847 issued on October 19, 1995.
⁵ Limit was established pursuant to CP number 181-6262 issued on November 12, 1996.
⁶ Limit was established based on calculations derived from CP number 181-2618 issued on March 3, 1993.
⁷ Limit was established pursuant to Part 70 Modification number 181- 10616 issued on October 5, 1999.

Comment 44:

The 30 million Btu/hour boiler identified as 5-001 was actually constructed in 1975, not 1970.

Response to Comment 44:

The correct date of construction is noted in this comment and the rule 326 IAC 6-2-4 application to this boiler was changed to 326 IAC 6-2-3.

Comment 45:

The 326 IAC 6-2-3 allowable particulate matter emission limit for Boiler 5-001 was calculated incorrectly based on a stack height of 25 feet, the actual stack height is 50 feet. This would double the calculated PM allowable limit to 1.7 lb PM/MM Btu. However, 326 IAC 6-2-3 (e) states that for any facility used for indirect heating which has 250 MM Btu/hr heat input or less and which began operation after June 8, 1972, shall in no case exceed 0.6 lb of PM/MM Btu. Therefore, the allowable PM limitation for boiler 5-001 is 0.6 lb/MM Btu.

Response to Comment 45:

OAQ agrees. The rule citation and PM limitation has been corrected in the permit.

Comment 46:

The calculations under the heading 326 IAC 6-2-1 (Particulate Emission Limitations for Sources of Indirect Heating) (b) are incorrect.

Response to Comment 46:

OAQ agrees. The revised calculation is as follows:

- (b) The 29 MMBTU/hr wood fired boiler identified as 5-002 controlled by a cyclone constructed on February 1, 1995, is subject 326 IAC 6-2-4.

$$Pt = \frac{1.09}{Q^{0.26}} \quad \text{where: } Pt = \text{lbs of PM emitted/MMBTU heat input} \\ Q = \text{total source maximum operating capacity, MMBTU/hr}$$

$$Pt = \frac{1.09}{Q^{0.26}} = \frac{1.09}{(29 + 30)^{0.26}}$$

$$Pt = 0.38 \text{ lb of PM/MMBTU}$$

$$PM = (0.38 \text{ lb/MMBTU}) * (29 \text{ MMBTU/hr}) = 11 \text{ lbs/hr}$$

Upon further review, the OAQ has decided to make the following revisions to the permit:

- (a) Throughout the Permit and the TSD Addendum, all references to the Office of Air Management (OAM) has been changed to the Office of Air Quality (OAQ).
(b) The Table Of Contents has been modified to reflect these changes.

- (c) All other changes will be indicated by bolding language has been added, and putting a line through the language that has been deleted.

1. General Revision noted in the TSD Addendum:

Source Definition

This trailer manufacturing plant consists of six (6) plants:

- (a) Plant 1 is located at 6929 N. US HWY 421, Monon, Indiana, previously Plant ID 181-00016;
- (b) Plant 2 is located at 6929 N. US HWY 421, Monon, Indiana, previously Plant ID 181-00016;
- (d) Plant 5 is located at State Road 16 West, Monon, Indiana, previously held a Plant ID of 181-00010;
- (d) Plant 6 is located at 6929 N. US HWY 421, Monon, Indiana, previously Plant ID 181-00016;
- (e) Plant 7 is located at 6929 N. US HWY 421, Monon, Indiana, previously Plant ID 181-00016;
- (f) Plant 8 is located at 6929 N. US HWY 421, Monon, Indiana, previously Plant ID 181-00016;

Plant 5 is located on property less than (2) two miles from the Main Facility location. Plant 5 is separated from the main facility by the town of Monon, and HPA Monon does not own the separating properties. Plants 1, 2, 6, 7 & 8 are located on contiguous properties. Plant 5 performs the flooring operation for the trailers. Plant 5 and the other plants have the same SIC codes and are owned by (1) one company. The (6) six plants will be considered (1) one source, effective from the date of issuance of this Part 70 permit. The combination of Plant 5, Plant 1, Plant 2, Plant 6, Plant 7, and Plant 8 into one source will be identified as Plant ID of 181-00041.

2. The source, 181-00016, became a major source of VOC as of the issuance of Permit 181-3416-00016 in 1995. The incorporation of Plant 5 (previously identified as 181-00010) into the existing source (previously identified as 181-00016), does not constitute a major modification of a major source because the primary source of emissions, the wood fired boilers, identified as 5-001 and 5-002, were constructed and permitted in 1975 and 1994, respectively, prior to source 181-00016 becoming a major PSD source. Therefore, it is not necessary, due to the combination of sources previously identified as 181-00016 and 181-00010, into one (1) Title V source, identified as 181-00041, to correct any decisions previously rendered by IDEM. However, TV source 181-00041 is considered a major source under PSD.

Section B

1. B.1 (Permit No Defense) has been deleted. This is not in IC13, but we do have the general authority for this in 326 IAC 2-7-15. Therefore, most of this language has been added to B.14 (Permit Shield). B.14 provides for when the possession of a permit does provide a defense and provides that it is only for those requirements in existence at the time of permit issuance. All other B conditions have been re-numbered as a result of this change.

~~B.1 Permit No Defense [IC 13]~~

- ~~(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.~~
- ~~(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."~~

2. B.12 (Emergency Provisions) a reference to the Emergency Occurrence Report Form has been added to B.12(b)(5). The emergency form is for emergencies only , and is no longer an emergency and deviation form. All deviations will now be reported on the Quarterly Deviation and Compliance Monitoring Report. Paragraph (d) part of the first sentence has been deleted. Since we know it is a TV source, then we also know the malfunction rule has been superceded by the emergency rule. Paragraph (f) "compliance" has been changed to "accordance".

B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967
 - (5) For each emergency lasting one (1) hour or more, the Permittee submitted **the attached Emergency Occurrence Report Form or its equivalent** notice, either **in writing by mail** or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) ~~for sources subject to this rule after the effective date of this rule.~~ This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in ~~compliance~~ **accordance** with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

3. B.14 (Permit Shield) has been revised as follows:

B.14 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

- (a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. **The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.**

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.
- (c) ~~The IDEM, OAQ has determined that the following requirements are not applicable to this source:~~ **In addition to the non-applicability determinations set forth in Sections D of this permit, the IDEM, OAQ has made the following determinations regarding this source:**
- (1) Numerical limitations from the previous existing construction permits were incorporated into the Part 70 permit, except limits from:
 - (A) CP 181-6262-00016 issued November 12, 1996, which limited Plant 8 cross member paint booth to 100 tons per year of Volatile Organic Compounds. This paint booth has been dismantled and removed from the HPA Monon property.
 - (B) CP 181-2618-00016 issued March 3, 1993, for the Plant 6 chassis booth, identified as 6-001. The production limitation of 5 parts per hour has been removed and replaced with its calculated corresponding emission limitation of 250 tons of VOC per consecutive 12 month period rolled on a monthly basis.
 - (C) CP 181-3416-00016 issued Feb 2, 1995, for multiple sources in which all production limits have been removed and replaced with the following emission limits:
 - (i) Plant 7 Hub Paint Booth, identified as 7-002, production limitation of 35 units per hour has been removed. Plant 7 Converter Dolly Paint Booth, identified as 7-001, production limitation of 6.5 units per hour has been removed and replaced with an emission limitation of 25 tons per year of VOC.

- (ii) Plant 8 Coupler Paint Booth, identified as 8-002, production limitation of 3 units per hour has been removed, the description “with a maximum capacity of 10.2 gal/hr” will remain. Plant 8 Module Paint Booth, identified as 8-001, production limitation of 9 units per hour has been removed and replaced with an emission limitation of 84 tons per year of VOC.
 - (iii) Plant 2 Paint Booth, identified as 2-001, production limitation of 2 units per hour has been removed and replaced with an emission limitation of 60 tons per year of VOC.
- (D) CP 181-4987-00016 issued April 16, 1996 for the Plant 8 small paint booth, identified as 8-003. The production limitation of 6 trailers per hour has been removed and replaced with an emission limitation of 40 tons per year of VOC.
- (E) CP 181-3416-00016 issued February 2, 1995, for the following sources:
 - (i) Plant 6 steel shot blaster, identified as 6-002. The Particulate Matter emission rate of 41.0 pounds per hour, was calculated based on the total process weight rate of 67,200 pounds per hour. This limitation replaces a rate that was based on a process make up rate
 - (ii) Plant 8 steel shot blaster, identified as 8-005. The Particulate Matter emission rate of 14.7 pounds per hour, was calculated based on the total process weight rate of 13,500 pounds per hour. This limitation replaces a rate that was based on a process make up rate.
- (F) CP 181-2618-00016 issued on March 3, 1993 for the Plant 6 steel shot blaster, identified as 6-003. The Particulate Matter emission rate of 45.3 pounds per hour was calculated based on the total process weight rate of 108,000 pounds per hour. This limitation replaces a rate that was based on a process make up rate
- (G) CP- 181-3664-00010 issued February 1, 1995, for the following sources:
 - (i) The Particulate Matter emission rate of 14.1 pounds per hour, for the wood working operations identified as 5-003, was calculated based on the total process weight rate of 12,600 pounds per hour
 - (ii) The Particulate Matter emission rate of 32.3 pounds per hour, for the planer operations identified as 5-004, was calculated based on the total process weight rate of 43,500 pounds per hour.
- (2) Additional modifications of the previous existing construction permits were made for the following conditions:
 - (A) Plant 8 Boiler, identified as 8-006, monitoring method using wood burn rate has been removed and replaced with a requirement to continuously record steam production.

- (B) CP 181-4762-00016 and Plant 8 Permit 70 Modification requires multi cyclone removal efficiency. This has been removed due to physical limitations of the existing equipment.
 - (C) CP-181-4987-00016 requirements to tag filters and maintain 24 months of records has been removed and replaced with Preventive Maintenance Plan requirements.
 - (D) CP-91-09-90-0087 indicated average boiler output of 14,000 pounds of steam per hour. This description has been modified to reflect the maximum boiler BTU input rating of 30 MMBTU per hour.
 - (d) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, ~~including any term or condition from a previously issued construction or operation permit~~, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
 - (e) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
 - (f) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
 - (g) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
 - (h) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
 - (i) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]
4. B.15 (Deviations from Permit Requirements and Conditions) we are no longer requiring sources to report deviations in 10 days. Now they will report deviations quarterly on the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report have been removed since deviations will not be reported on that form anymore. There is no longer a 5% exception for reporting deviations, since we relaxed the 10 day notification to a quarterly report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch **Data Section**, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

~~within ten (10) calendar days from the date of the discovery of the deviation using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. except for the failure to perform the monitoring or record the information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~ **Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.**

The notification by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3)(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (C) **Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.**

- ~~(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- ~~(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.~~

5. C.22 (General Reporting Requirements) the Semi-Annual Compliance Monitoring Report is now the Quarterly Deviation and Compliance Monitoring Report. References to the emergency report has been removed, all the information is in B.13. In (d) we have clarified that the report does need to be certified by the responsible official, this change is also reflected in all the D sections and the reporting forms. EPA has also requested this change.

C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) ~~To affirm that the source has met all the compliance monitoring requirements stated in this permit~~ The source shall submit ~~a~~ **the attached** Quarterly Deviation and Compliance Monitoring Report **or its equivalent**. Any deviation from the permit requirements, ~~and~~, the date(s) of each deviation, **the cause of the deviation, and the response steps taken** must be reported. **This report shall be submitted within thirty (30) days of the end of the reporting period.** The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- ~~(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.~~
- ~~(g)~~**(e)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.
6. The Emergency Occurrence Report, the Quarterly Deviation Report, and the Compliance Monitoring Report have all been updated to the latest language.
7. EPA has stated that all reports are required to certified, so any language stating that certification is not required has been deleted from B.18 Permit Amendment or Modification, B.23 Transfer of Ownership or Operation, D Reporting Requirements, and Monthly or Quarterly Report Forms.
8. Condition D.1.1 addresses the solvent spraying for clean-up and color changes, and should include additional language to incorporate work practices to minimize solvent emissions from containers used to store the guns during periods of non-production. Condition D.1.1 has been changed as follows:

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the finish paint booth 1-001, paint booth 1-002, primary paint booth 2-001, chassis & prime line 6-001, converter dolly paint booth 7-001, hub paint booth 7-002, primer booth 8-001, finish paint booth 8-002 and small paint booth 8-003, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Solvent containers used for gun storage during periods of nonproduction shall be closed in order that evaporation is minimized.

9. For clarity, Condition D.2.4 has been revised as follows:

D.2.4 Particulate Matter (PM)

The baghouses for PM control shall be in operation and control emissions ~~from the grinder & shot blasting~~ at all times the **respective operations** (wood working operations, hog grinder, wood planer, steel grit blaster, steel shot blaster, glass & steel shot blaster, and large steel shot blaster) are in operation.

10. Condition D.2.7 has been reworded to reflect daily VEs of specific baghouse stack exhausts as follows:

D.2.7 Visible Emissions Notations

- (a) Daily visible emission notations of the **baghouse stack exhaust for the** woodworking operations, wood planer, grinding and blasting ~~stack exhaust~~ shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

11. The source submitted their Title V permit application on December 12, 1997. Pursuant to 326 IAC 2-7-4 (a)(A)(i), the source should have submitted their Title V application by December 13, 1996, and did not do so. Therefore, a referral to the Office of Enforcement has been made and the source has the following enforcement actions pending:

- (1) Violation of 326 IAC 2-7-4(a)(A)(i).